

UNITED STATES IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,) Cr. No. 04-00363-02 SOM
vs.)
DANIEL LYNN MYERS, (02)) DECLARATION OF COUNSEL
Defendant.)

DECLARATION OF COUNSEL

LANE Y. TAKAHASHI hereby declares as follows:

1. I am the attorney for the Defendant, DANIEL LYNN MYERS, having been appointed pursuant to the Criminal Justice Act;
2. The sentencing hearing in the above-captioned matter is currently set for October 30, 2006 at 1:30 p.m.;
3. As reflected in Addendum No. 2 to the Presentence Report, the Defendant has been diagnosed with "High grade superficial bladder cancer" and has received chemotherapy in California during 2005;
4. The Defendant has recently received a blood and urine workup at the Federal Detention Center Medical Facility in anticipation of a local medical examination to determine the status of his condition;
5. I have spoken with Assistant U. S. Attorney, Kenneth M. Sorenson, and he has no objection to this motion;
6. Accordingly, a (3) three month continuance is requested in this case in order to have knowledge of the Defendant's current medical condition prior to his sentencing hearing.



LANE Y. TAKAHASHI
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document was duly mailed and/or hand-delivered to the following on October 18, 2006:

Kenneth M. Sorenson
Assistant U.S. Attorney
PJKK Federal Building
300 Ala Moana Boulevard, Room 6100
Honolulu, Hawaii 96813
Attorney for Plaintiff
UNITED STATES OF AMERICA

Dated: Honolulu, Hawaii, October 18, 2006.



Lane Y. Takahashi